

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

LORENZO BYRD, ON BEHALF OF  
TOMMY L. BYRD, AN  
INCOMPETENT ADULT,

PLAINTIFF,

v.

UNITED STATES OF AMERICA,

DEFENDANT.

Civil Action No.

1:20-cv-03090-LMM

**DEFENDANT'S FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS TO PLAINTIFF**

Defendant United States of America (“Defendant” or “United States”), by and through the United States Attorney for the Northern District of Georgia, requests that Plaintiff produce the requested documents to Trishanda Treadwell, Assistant U. S. Attorney, Office of the United States Attorney, 75 Ted Turner Drive S.W., Suite 600, Atlanta, Georgia 30303, in accordance with Rule 34 of the Federal Rules of Civil Procedure.

**Definitions**

1. “Complaint” shall mean Plaintiff’s Original Complaint filed on July 24, 2020 [Doc. 1].
2. “Document” shall mean all items described in Rule 34(a) of the Federal Rules of Civil Procedure.

3. Within the Requests in this document, “Plaintiff” shall mean Tommy Byrd, as well as his agents, affiliates, representatives, or any other persons acting, or who acted, or who purported to act on his behalf.
4. “You” and “your” shall refer to Plaintiff, as well as his agents, affiliates, representatives, or any other persons acting, or who acted, or who purported to act on his behalf.
5. Within the Requests in this document, the United States Department of Veteran of Affairs shall be referenced by name or as Defendant, Agency, VAMC, or United States.
6. “And” and “or” shall mean and include both the conjunctive and the disjunctive.
7. “Referring or relating” shall mean reflecting, containing, pertaining, indicating, showing, concerning, constituting, evidencing, describing, discussing, or otherwise mentioning.
8. The singular shall mean and include the plural, and vice versa.

### **Instructions**

1. Production of documents is requested of documents, including all attachments, appendices, exhibits, cover sheets, or facsimile transmission sheets.
2. If any responsive document is to be withheld or redacted on the basis of a claim of privilege or work product, your response should provide the information required by Fed. R. Civ. P. 26(b)(5)(A)(i) and (ii).
3. As to each request, if you object to the request, then for each objection indicate whether any responsive materials are being withheld on the basis of that objection.
4. These Requests are continuing, requiring that you supplement production if you obtain at any time additional or different documents or tangible things which are responsive to these Requests.

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**CERTIFICATE OF SERVICE**

I certify that on this day, I have served the foregoing **DEFENDANT'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS** on counsel of record by emailing a copy to Plaintiff's counsel of record to the email addresses listed below:

Tom Jacob

[tjacob@nationaltriallaw.com](mailto:tjacob@nationaltriallaw.com)

Whitehurst, Harkness, Brees, Cheng, Alsaffer,  
Higginbotham & Jacob, P.L.L.C.

7500 Rialto Blvd. Bldg. Two

Suite 250

Austin, TX 78735

This \_\_\_\_ day of \_\_\_\_\_.

*/s/Trishanda L. Treadwell*  
Trishanda Treadwell  
Assistant U.S. Attorney

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**DEFENDANT'S FIRST INTERROGATORIES TO PLAINTIFF**

Defendant United States of America (“Defendant” or “United States”), by and through the United States Attorney for the Northern District of Georgia, requests that requests that Plaintiff provide verified responses to the interrogatories, as required by the Federal Rules of Civil Procedure 33, the Local Rules, and the Standing Orders of the Court. To the extent Plaintiff asserts any objection, Plaintiff should respond to any portion that is unobjectionable. Plaintiff should serve the verified interrogatory responses via email to Trishanda L. Treadwell at [trish.treadwell@us.doj.gov](mailto:trish.treadwell@us.doj.gov).

**Definitions**

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2. “Document” shall mean all items described in Rule 34(a) of the Federal Rules of Civil Procedure.

3. “Plaintiff” shall mean Tommy Byrd, as well as his agents, affiliates, representatives, or any other persons acting, or who acted, or who purported to act on his behalf.
4. “You” and “your” shall refer to Plaintiff, as well as his agents, affiliates, representatives, or any other persons acting, or who acted, or who purported to act on his behalf.
5. The United States Department of Veteran of Affairs may be referenced by name or as Defendant, Agency, VAMC, or United States.
6. “And” and “or” shall mean and include both the conjunctive and the disjunctive.
7. “Referring or relating” shall mean reflecting, containing, pertaining, indicating, showing, concerning, constituting, evidencing, describing, discussing, or otherwise mentioning.
8. The singular shall mean and include the plural, and vice versa.
9. The term “identify” means:

When used with respect to a person, his/her or its:

- (a) full name and present known address;
- (b) present or last known position and business affiliation;
- (c) position and business affiliation at the time in question;
- (d) residence telephone number and business telephone number

When used with reference to a document:

- (a) the date it was created;
- (b) its author, and if different, the signor or signors;
- (c) the addressee(s);
- (d) its present or last known custodian; and
- (e) the type of document.

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**CERTIFICATE OF SERVICE**

I certify that on this day, I have served the foregoing **DEFENDANT'S FIRST  
INTERROGATORIES TO PLAINTIFF** on counsel of record by emailing a copy  
to Plaintiff's counsel of record to the email addresses listed below:

Tom Jacob  
[tjacob@nationaltriallaw.com](mailto:tjacob@nationaltriallaw.com)  
Whitehurst, Harkness, Brees, Cheng, Alsaffer,  
Higginbotham & Jacob, P.L.L.C.  
7500 Rialto Blvd. Bldg. Two  
Suite 250  
Austin, TX 78735

This 23rd day of December, 2020.

*/s/Trishanda L. Treadwell*  
Trishanda Treadwell  
Assistant U.S. Attorney